

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,)
))
) Plaintiff,)
))
) v.) C.A. No. 04-10353-PBS
))
))
))
VOICE SIGNAL TECHNOLOGIES, INC.,)
LAURENCE S. GILLICK, ROBERT S.)
ROTH, JONATHAN P. YAMRON, and)
MANFRED G. GRABHERR,)
))
) Defendants.)
))

DECLARATION OF WENDY S. PLOTKIN

Wendy S. Plotkin deposes and states as follows:

1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the Voice Signal Technologies, Inc.'s Opposition to ScanSoft, Inc.'s Motion to Compel Further Production of Documents and Responses to Interrogatories.

2. Attached hereto as Ex. A is a true and correct copy of a portion of the deposition transcript of Thomas J. Lazay.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Wendy S. Plotkin

Dated: June 8, 2005

Exhibit A

ESQUIRE DEPOSITION SERVICES

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

- - - - -
SCANSOFT, INC., :
Plaintiff, :
VS. :
VOICE SIGNAL TECHNOLOGIES, : CASE NO.
INC., LAURENCE S. GILLICK, : 04-10353-PBS
ROBERT S. ROTH, JONATHAN P. :
YAMRON and MANFRED G. :
GRABHERR, :
Defendants. :
- - - - -

DEPOSITION OF THOMAS J. LAZAY, a witness
called by and on behalf of the Plaintiff, taken
pursuant to the applicable provisions of the
Federal Rules of Civil Procedure, before
Sandra L. Bray, Registered Diplomate Reporter,
CSR Number 103593, and Notary Public in and for
Commonwealth of Massachusetts, at the offices of
Bromberg Sunstein LLP, 125 Summer Street,
Boston, Massachusetts, on Wednesday, May 25,
2005, commencing at 10:14 a.m.

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1-866-619-3925

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	Page 2		Page 4
1	APPEARANCES:	10:14:24 1	PROCEEDINGS
2	Representing the Plaintiff:	10:14:24 2	(The Massachusetts driver's license
3	CHOATE HALL & STEWART	10:14:24 3	number as identification of the deponent
4	53 State Street	10:14:24 4	was noted for the record.)
5	Exchange Place	5	THOMAS J. LAZAY, having duly sworn or
6	Boston, Massachusetts 02109	6	affirmed that his testimony would be the truth,
7	BY: PAUL D. POPEO, P.C.	7	the whole truth, and nothing but the truth,
8		8	testified as follows:
9	Representing the Defendants:	9	* * *
10	BROMBERG SUNSTEIN LLP	10:14:29 10	EXAMINATION BY MS. FLEMING:
11	125 Summer Street	10:14:29 11	Q. Mr. Lazay, could you state your name and spell
12	Boston, Massachusetts 02110	10:14:32 12	it for the record, please?
13	BY: LISA M. FLEMING, ESQUIRE	10:14:33 13	A. Thomas Lazay, L A Z A Y .
14		10:14:36 14	Q. And, Mr. Lazay, have you been deposed before?
15		10:14:40 15	A. No, I have not.
16		10:14:40 16	Q. New experience?
17		10:14:41 17	A. Yes.
18		10:14:41 18	Q. I'm going to ask you a series of questions, and
19		10:14:44 19	if at any time you don't understand a question,
20		10:14:46 20	I want you to let me know that. My role here is
21		10:14:49 21	to ask you questions that you understand so I
22		10:14:52 22	can get intelligible answers. So it's not -- my
23		10:14:56 23	role is not to deceive you in any way. So if
24		10:15:01 24	you feel like you don't understand a question,
	Page 3		Page 5
1	INDEX		
2	WITNESS:	PAGE NO.	please let me know, and I'll do my best to
3	THOMAS J. LAZAY		rephrase it. Okay?
4	BY MS. FLEMING	4	A. Okay.
5	EXHIBITS		Q. If at any time during today's session you want
6	NO. DESCRIPTION	PAGE NO.	to take a break, let me know that too, and we'll
7	1 Voice Signal Technologies Web	10:15:04 1	accommodate you. At some point, we'll take a
8	Site Printout 13	10:15:06 2	lunch break, and we'll work that out with
9	2 VSuite 1.2.00 Mass Market	10:15:06 3	counsel as to timing.
10	Handsets User Interface	10:15:07 4	The only other thing I would ask you,
11	Specification 80	10:15:08 5	that when you do respond, you respond audibly
12	3 VSuite 2.0 Mass Market Handsets	10:15:09 6	because if you shake your head or nod,
13	User Interface Specification 100	10:15:12 7	oftentimes the court reporter can't record that
14	4 Document entitled Samsung	10:15:14 8	properly, and we want to have an accurate
15	Korean VSuites 129	10:15:20 9	transcript when we're through today. Okay?
16	5 Marketing Requirements	10:15:21 10	A. Okay.
17	Specification 131	10:15:21 11	Q. Great. Are you presently employed, Mr. Lazay?
18	6 Copy of E-mail from	10:15:23 12	A. Yes, I am.
19	Mr. Gillick, dated 4-19-01 180	10:15:25 13	Q. By whom?
20	7 Copy of E-mail to Mr. Yamron,	10:15:31 14	A. Voice Signal Technologies.
21	dated 5-7-01 195	10:15:34 15	Q. Can you start -- give me your educational
22	8 Document entitled Core	10:15:34 16	background starting with high school, please.
23	Technology at VST 198	10:15:38 17	A. I graduated from King Phillip Regional High
24		10:15:39 18	School in Wrentham, Massachusetts, and I have a
		10:15:39 19	bachelor's degree in computer science from
		10:15:41 20	
		10:15:44 21	
		10:15:46 22	
		10:15:49 23	
		10:15:51 24	

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		Page 42			Page 44
10:55:35 1	the question.		10:57:14 1	Q. What does VSuite Version 1.1 do as a product?	
10:55:35 2	A. Can you clarify your question?		10:57:19 2	A. VSuite 1.1 can recognize voice commands. It can	
10:55:37 3	Q. Sure. Well, you said that Voice Tag recognizes		10:57:31 3	recognize sequences of digits, and it can	
10:55:41 4	speech?		10:57:39 4	interact with other software on the phone.	
10:55:41 5	A. Yes.		10:57:43 5	MR. POPEO: Miss Fleming, can we go	
10:55:41 6	Q. And I'm wondering if VSuite also recognizes		10:57:46 6	off the record for a second?	
10:55:45 7	speech.		10:57:47 7	MS. FLEMING: Sure.	
10:55:46 8	MR. POPEO: Objection.		10:58:13 8	(Discussion off the record)	
10:55:47 9	A. VSuite can contain Voice Tag.		10:58:19 9	(Recess taken from 10:58 a.m. to	
10:55:51 10	Q. But on its own. My question is, on its own		11:02:10 10	11:02 a.m.)	
10:55:55 11	without Voice Tag, can VSuite recognize speech?		11:02:13 11	Q. Okay. Mr. Lazay, before the break, we were	
10:55:58 12	MR. POPEO: Objection to the form of		11:02:15 12	talking about the various products that Voice	
10:55:59 13	the question. Are you asking whether it offered		11:02:18 13	Signal offers and sells or develops, and you	
10:56:02 14	VSuite in a configuration without a voice		11:02:21 14	were describing for me what VSuite is. Do you	
10:56:06 15	recognizer as a component?		11:02:24 15	remember that testimony?	
10:56:08 16	MS. FLEMING: I'm just asking what		11:02:24 16	A. I do.	
10:56:09 17	each of these products are to his understanding.		11:02:26 17	Q. Okay. And am I correct that Voice -- you	
10:56:09 18	MR. POPEO: Let's have some		11:02:31 18	testified that Voice Tag is a speech recognizer,	
10:56:10 19	clarification. If you need her to rephrase the		11:02:34 19	correct?	
10:56:12 20	question, you ought to ask for that. So let's		11:02:35 20	A. Correct.	
10:56:16 21	continue.		11:02:35 21	Q. And Voice Tag can be configured with VSuite?	
10:56:20 22	A. Did you ask whether VSuite can be configured		11:02:39 22	A. Voice Tag can be contained within VSuite.	
10:56:23 23	without Voice Tag?		11:02:43 23	Q. Can be contained in VSuite. Thank you. But it	
10:56:25 24	Q. Yes.		11:02:48 24	doesn't have to be?	
		Page 43			Page 45
10:56:26 1	A. Yes, it can.		11:02:50 1	MR. POPEO: You said contained in each	
10:56:26 2	Q. What does VSuite do if it doesn't have Voice Tag		11:02:51 2	iteration of VSuite?	
10:56:31 3	configured in it?		11:02:53 3	Q. Or in any iteration of VSuite.	
10:56:32 4	MR. POPEO: Object to the form of the		11:02:56 4	A. Yes.	
10:56:34 5	question. Are you asking whether there are		11:02:56 5	Q. And if Voice Tag is not contained in VSuite,	
10:56:35 6	configurations of VSuite which don't contain		11:03:02 6	does VSuite work as a user interface? Does it	
10:56:38 7	Voice Tag?		11:03:05 7	perform its functions as a user interface?	
10:56:39 8	MS. FLEMING: He already answered		11:03:08 8	MR. POPEO: I object to the form of	
10:56:40 9	that.		11:03:09 9	the question.	
10:56:40 10	MR. POPEO: I think your question		11:03:09 10	A. VSuite can function if it has another recognizer	
10:56:41 11	assumes a fact which is not in evidence. You		11:03:13 11	inside.	
10:56:43 12	can answer the question if you can.		11:03:13 12	Q. Okay. Does Voice Signal have other recognizers	
10:56:44 13	A. I'm just not clear on the question.		11:03:20 13	by common names that you can name for me?	
10:56:46 14	Q. Then why don't you tell me what VSuite does as a		11:03:22 14	A. It does.	
10:56:50 15	product?		11:03:23 15	Q. Can you tell me what those other voice	
10:56:51 16	A. Again, that depends on the version of VSuite and		11:03:26 16	recognizers are called?	
10:56:55 17	the particular configuration.		11:03:28 17	A. They're called CCR.	
10:56:58 18	Q. And do you know about the different versions of		11:03:30 18	Q. Okay.	
10:57:00 19	VSuite?		11:03:32 19	A. And Elvis.	
10:57:01 20	A. I do.		11:03:37 20	Q. Okay. Can you tell me what the difference	
10:57:01 21	Q. So let's take Version -- VSuite Version 1.1.		11:03:39 21	between Elvis and Voice Tag is?	
10:57:10 22	Are you familiar with that?		11:03:42 22	MR. POPEO: Objection.	
10:57:11 23	A. I believe I'm -- at a high level, I'm familiar		11:03:51 23	A. I don't believe I can at any meaningful level.	
10:57:14 24	with it.		11:03:54 24	Q. Is Elvis a product that Voice Signal offers to	

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11:03:57 1 customers?	11:05:52 1 MR. POPEO: Yes or no, please.
11:03:58 2 MR. POPEO: Object to the form of the	11:05:53 2 A. I don't believe so.
11:03:59 3 question. If you understand it, you can answer	11:05:56 3 Q. Okay. Now, I apologize if I asked this earlier,
11:04:01 4 it.	11:06:05 4 but your counsel will point that out to me if I
11:04:01 5 A. No, we don't offer Elvis as a product.	11:06:09 5 did. Is the software that Voice Signal
11:04:04 6 Q. Do you offer Voice Tag as a product?	11:06:11 6 developed for Lamp Commander different than the
11:04:08 7 MR. POPEO: Same objection.	11:06:15 7 software developed for VSuite?
11:04:10 8 A. No.	11:06:17 8 MR. POPEO: Objection. You can
11:04:10 9 Q. So am I right that the only way that a customer	11:06:19 9 answer.
11:04:16 10 gets to use Voice Tag is if they license	11:06:19 10 A. Yes.
11:04:20 11 VSuite --	11:06:19 11 Q. How is it different, if you know?
11:04:20 12 MR. POPEO: Objection.	11:06:23 12 MR. POPEO: Same objection, but you
11:04:24 13 Q. -- and Voice Tag is contained in VSuite; is that	11:06:25 13 can try to answer.
11:04:27 14 right?	11:06:26 14 A. I don't know.
11:04:31 15 A. I'm sorry. Can you rephrase?	11:06:26 15 Q. But you just know that it's different?
11:04:33 16 Q. In other words, you don't sell or license Voice	11:06:28 16 A. I know software that controls a lamp is not the
11:04:35 17 Tag to customers?	11:06:33 17 same as software that goes into a phone.
11:04:36 18 A. Correct.	11:06:35 18 MR. POPEO: And by that, I take it
11:04:37 19 Q. And am I right that you don't sell or license	11:06:36 19 you're asking whether it's identical to the --
11:04:41 20 CCR to customers?	11:06:39 20 MS. FLEMING: No, I'm just asking if
11:04:44 21 MR. POPEO: Of itself?	11:06:41 21 he knows what the differences are.
11:04:45 22 MS. FLEMING: Of itself.	11:06:42 22 MR. POPEO: Okay. I think he's
11:04:47 23 A. That's correct.	11:06:43 23 answered that question.
11:04:53 24 Q. Am I correct that the only two products that	11:06:45 24 A. I don't know the differences.
Page 47	Page 49
11:04:57 1 Voice Signal licenses in the wireless handset	11:06:47 1 Q. But you know there are differences?
11:05:00 2 market are VSuite and VoiceMode?	11:06:48 2 A. It's my belief there are differences.
11:05:06 3 MR. POPEO: Object to the form.	11:06:51 3 Q. And what do you base that belief on?
11:05:07 4 A. I believe I also mentioned PC Link.	11:06:52 4 A. I base that belief on the time frame in which
11:05:09 5 Q. I'm sorry, and PC Link. Are those three	11:06:57 5 the software was developed for Lamp Commander.
11:05:13 6 products the only products -- I recognize they	11:07:02 6 I don't believe any piece of software is static
11:05:17 7 may be different versions of the product, but	11:07:04 7 for years and years and years. So that's my
11:05:20 8 are they the only products -- only three	11:07:07 8 primary reason. And the application is,
11:05:23 9 products that Voice Signal sells in the wireless	11:07:09 9 obviously, much different.
11:05:26 10 handset market?	11:07:11 10 Q. Okay. Now, you testified that at some point in
11:05:28 11 MR. POPEO: Object to the term	11:07:23 11 late 1999, the company began to develop products
11:05:32 12 "sells."	11:07:29 12 in areas other than the toy marketplace; is that
11:05:33 13 A. Yes, I believe so.	11:07:33 13 right?
11:05:33 14 Q. And are they the only three products that Voice	11:07:33 14 A. That's my recollection, yes.
11:05:37 15 Signal licenses in the wireless handset market?	11:07:35 15 Q. And were you involved in the decision to move
11:05:41 16 A. That's my understanding.	11:07:39 16 into the wireless handset market space?
11:05:41 17 Q. And are there other products in development at	11:07:42 17 A. I believe I was.
11:05:42 18 Voice Signal in the wireless handset market?	11:07:43 18 Q. Okay. And am I right that part of the decision
11:05:42 19 MR. POPEO: Object to the form. You	11:07:49 19 involved discussions that you had with Dan Roth?
11:05:44 20 can answer that as a yes or no, please.	11:07:52 20 A. I believe so.
11:05:46 21 A. Can you repeat?	11:07:52 21 Q. Okay. And do you know whether there are
11:05:47 22 Q. Sure. Are there other products that Voice	11:07:55 22 documents that reflect those discussions at
11:05:49 23 Signal is developing in the wireless handset	11:07:58 23 Voice Signal?
11:05:51 24 market?	11:07:59 24 MR. POPEO: Objection.

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13:09:05 1	front of you Versions 1.2 and 2.0. And earlier,	13:11:03 1	with VoiceMode?
13:09:10 2	you testified that there was documentation that	13:11:05 2	A. For the exact same reasons that I stated before
13:09:13 3	would accompany your products that go to	13:11:08 3	for VSuite.
13:09:18 4	particular entities that you license the product	13:11:09 4	Q. Which are?
13:09:21 5	to; is that correct?	13:11:12 5	MR. POPEO: Objection. You can answer
13:09:22 6	MR. POPEO: Objection.	13:11:14 6	again if you can.
13:09:22 7	Q. Did I state that accurately?	13:11:14 7	A. Okay. One, to notify the customer of the
13:09:24 8	MR. POPEO: Objection,	13:11:19 8	behavior of the product from us that they're
13:09:26 9	mischaracterizes.	13:11:22 9	receiving; two, so that they know how to test it
13:09:27 10	A. What I stated was that this document in whole or	13:11:28 10	for compliance, and the third reason, which I
13:09:30 11	in part could be provided to our customers.	13:11:31 11	don't think I mentioned before, would be if
13:09:32 12	Q. And when you say "this document," you're	13:11:32 12	their documentation department for their product
13:09:36 13	referring to Exhibit 2?	13:11:37 13	manuals needed to understand how to describe the
13:09:36 14	A. Any of the user interface descriptions, yes.	13:11:39 14	functionality to an end user, they might refer
13:09:39 15	Q. They could be. And I believe you testified that	13:11:42 15	to this as well.
13:09:42 16	there may be other documents that are sent along	13:11:44 16	Q. And would the same be true for Voice Tag?
13:09:45 17	with your product. For instance, I think you	13:11:46 17	MR. POPEO: Object to the form of the
13:09:49 18	said user manual. Do you remember that?	13:11:47 18	question.
13:09:50 19	MR. POPEO: Objection.	13:11:48 19	A. No, I think I stated Voice Tag is a speech
13:09:51 20	A. Again, I think I said that in some cases, we may	13:11:50 20	recognition engine. It's not sold as a product.
13:09:56 21	have sent an end user manual that describes to	13:11:53 21	Q. And is there any other product in the speech
13:09:58 22	an end user how they might use it so that the	13:11:56 22	recognition area that you would license to a
13:10:01 23	OEM customer can write their user guide for the	13:12:00 23	customer and provide documentation with?
13:10:04 24	product manual.	13:12:03 24	MR. POPEO: Objection, asked and
	Page 119		Page 121
13:10:05 1	Q. Okay. Now -- and you testified earlier that	13:12:04 1	answered. You can answer it again.
13:10:16 2	there are other products that Voice Signal	13:12:06 2	A. No.
13:10:19 3	offers to or sells or licenses to manufacturers,	13:12:07 3	Q. By the way, in connection with this litigation,
13:10:22 4	correct?	13:12:10 4	have you been asked to search for documents?
13:10:23 5	MR. POPEO: Objection. You can	13:12:13 5	MR. POPEO: Yes-or-no answer.
13:10:24 6	answer.	13:12:15 6	A. Can you -- which type of documents?
13:10:24 7	A. I did.	13:12:17 7	Q. Any.
13:10:25 8	Q. And one such product is VoiceMode; is that	13:12:19 8	A. Yes.
13:10:31 9	correct?	13:12:19 9	Q. You have been?
13:10:31 10	A. Yes.	13:12:20 10	A. Yes.
13:10:32 11	Q. And is it also true that with the product	13:12:20 11	Q. And did you search for documents?
13:10:35 12	VoiceMode, Voice Signal might send similar	13:12:22 12	A. I produced documents to our lawyers.
13:10:40 13	documentation along with the product to the	13:12:24 13	Q. To your lawyers?
13:10:41 14	customer?	13:12:25 14	A. Yes.
13:10:42 15	MR. POPEO: Objection.	13:12:25 15	Q. And what were the kinds of documents you
13:10:43 16	A. Similar to?	13:12:30 16	produced in general terms?
13:10:44 17	Q. To these user interface specifications or some	13:12:33 17	A. Well, documents from my group, and specifically
13:10:49 18	other specifications or end user manuals that	13:12:39 18	these user interface documents are an example.
13:10:51 19	you described earlier.	13:12:42 19	Q. And you're referring to Exhibits 2 and 3?
13:10:52 20	MR. POPEO: Objection. You can	13:12:44 20	A. Yes.
13:10:54 21	answer.	13:12:53 21	Q. Now, I would like to go back to Exhibit 1, if I
13:10:54 22	A. Yes, we would send a similar user interface	13:12:56 22	can. Let me ask you, if you would -- it may not
13:10:57 23	document.	13:13:27 23	do any good to count. You may know better than
13:10:58 24	Q. And why would you send a user interface document	13:13:30 24	me. I'm looking for the manufacturers listing.

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13:13:35 1	Manufacturers.	13:15:29 1	product would be the speech recognizer or the
13:13:36 2	MR. POPEO: What does the front page	13:15:33 2	speech engine; is that right?
13:13:38 3	look like?	13:15:34 3	MR. POPEO: Objection. You can
13:13:39 4	MS. FLEMING: The front page has Voice	13:15:36 4	answer.
13:13:43 5	Signal at the top, and it has manufacturers and	13:15:36 5	A. Yes.
13:13:46 6	has Samsung, Motorola, and Nokia listed. It's	13:15:36 6	Q. Do you know what documentation was provided to
13:13:46 7	about three-quarters of the way in, maybe	13:15:41 7	Samsung with VSuite 2.0?
13:13:50 8	two-thirds in. If you want to give it to me, I	13:15:46 8	A. I do not, no.
13:13:52 9	can find it.	13:15:47 9	Q. How about with VSuite 1.3?
13:13:53 10	MR. POPEO: We know it's in here.	13:15:50 10	A. No.
13:13:55 11	Hold on.	13:15:50 11	Q. How about with VoiceMode?
13:13:55 12	MS. FLEMING: It's after Products,	13:15:52 12	A. No.
13:14:01 13	well after Products.	13:15:52 13	Q. Do you know if any documentation was provided to
13:14:02 14	MR. POPEO: Trade you.	13:15:55 14	Samsung?
13:14:04 15	MS. FLEMING: Thank you.	13:15:56 15	A. It's my belief that the documents we already
13:14:04 16	Q. Now, Mr. Lazay, this is part of, again,	13:15:59 16	discussed were in some form provided to Samsung
13:14:09 17	Exhibit 1, which is the printout of Voice	13:16:04 17	along the way.
13:14:12 18	Signal's Web site. Would you agree with that?	13:16:05 18	Q. In some form?
13:14:14 19	MR. POPEO: Objection.	13:16:06 19	A. Yes.
13:14:15 20	A. It looks that way, yes.	13:16:06 20	Q. Do you know who might know that or might be
13:14:17 21	Q. And I've referred you to a particular listing of	13:16:09 21	better able to answer that question?
13:14:20 22	manufacturers, correct?	13:16:10 22	A. Again, there's no single person for this kind of
13:14:21 23	A. Yes.	13:16:13 23	role that you're describing.
13:14:21 24	Q. And am I correct that those manufacturers are	13:16:15 24	Q. Do you know any person at Voice Signal that
	Page 123		Page 125
13:14:24 1	customers of Voice Signal?	13:16:18 1	interacts specifically or communicates
13:14:26 2	A. I believe so, yes.	13:16:21 2	specifically with Samsung?
13:14:27 3	Q. Okay. And if you would look at the first	13:16:22 3	MR. POPEO: Do you mean exclusively?
13:14:32 4	manufacturer, it indicates it's Samsung. Do you	13:16:25 4	MS. FLEMING: Well, no, I'm looking
13:14:34 5	see that?	13:16:28 5	for any person or persons.
13:14:35 6	A. I do.	13:16:29 6	A. It could be a large range of people, ranging
13:14:35 7	Q. And what is Samsung a customer of for Voice	13:16:32 7	from people on the executive team, like Dan
13:14:40 8	Signal?	13:16:35 8	Roth, to various members of the sales team to
13:14:40 9	MR. POPEO: Objection.	13:16:39 9	the engineers down to some of my staff.
13:14:41 10	A. Can you rephrase that?	13:16:43 10	Q. Okay. Now, the next manufacturer listed on the
13:14:45 11	Q. Sure. Do you license products to Samsung?	13:16:47 11	Web page is Motorola. Do you see that?
13:14:47 12	A. We do.	13:16:52 12	A. Yes.
13:14:47 13	Q. What products do you license to Samsung?	13:16:52 13	Q. And what products does Voice Signal license to
13:14:51 14	A. VSuite and VoiceMode.	13:16:55 14	Motorola, if you know?
13:14:55 15	Q. Which version of VSuite?	13:16:58 15	A. The VSuite products.
13:14:58 16	MR. POPEO: If you can recall.	13:17:00 16	Q. Okay. Any particular versions that you know?
13:15:00 17	A. The versions I can recall are 1.3 and 2.0, and	13:17:03 17	A. 1.2 and -- I'm sorry. Strike that. 2.0 and one
13:15:05 18	they may have also licensed earlier versions.	13:17:14 18	of the previous -- one or more of the previous
13:15:08 19	Q. Okay. And any other products besides VSuite and	13:17:17 19	versions, but I'm not exactly sure.
13:15:12 20	VoiceMode?	13:17:18 20	Q. Does Motorola have a product on the market --
13:15:14 21	A. PC Link, I believe, as well.	13:17:24 21	are they selling a product to the public that
13:15:17 22	Q. Any other products?	13:17:26 22	contains 2.0?
13:15:21 23	A. No, I don't think so.	13:17:28 23	MR. POPEO: Objection.
13:15:22 24	Q. Okay. And, again, included in the VSuite	13:17:28 24	A. No, they're not.

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